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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

ALEXANDRA RASEY-SMITH;
GORDON GENE MACCANI; and
JANET MACCANI,

Plaintiffs,

vs.

CITY OF LOS ANGELES; CALEB
GARCIA ALAMILLA; and DOES 2-
10, inclusive

Defendants.

Case No. 2:24-cv-03265-MWC-SSC

[Honorable Michelle Williams Court]

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
LEAVE TO FILE EXHIBITS
UNDER SEAL IN SUPPORT OF
THEIR OPPOSITION TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT**

*[Declaration of Eric Valenzuela filed
concurrently herewith]*

PLEASE TAKE NOTICE that Plaintiffs apply to the Court, pursuant to Local Rule 79-5.2.2(b), for leave to lodge under seal the eight officer interview exhibits, which are being filed concurrently with Plaintiffs' Opposition to Defendants' Motion for Partial Summary Judgment. Plaintiffs do not believe that good cause exists to lodge these exhibits under seal and only submit this application because the documents were produced by the defense as confidential pursuant to a protective order (ECF No. 36). These documents were produced as confidential by the defense and are subject to the protective order.

MATERIALS REQUESTED TO BE SEALED

Plaintiffs apply to file under seal the following items:

1. **Exhibit D-** Transcript of Recorded Interview of Officer Orozco;
2. **Exhibit G-** Transcript of Recorded Interview of Officer Chomuk;
3. **Exhibit H-** Transcript of Recorded Interview of Defendant Garcia;
4. **Exhibit I-** Transcript of Recorded Interview of Sergeant Punzalan;
5. **Exhibit J-** Transcript of Recorded Interview of Officer Jauregui;
6. **Exhibit Q-** Transcript of Recorded Interview of Officer Quintero;
7. **Exhibit R-** Transcript of Recorded Interview of Officer Rodriguez; and
8. **Exhibit S-** Transcript of Second Recorded Interview of Officer Rodriguez.

Plaintiffs do not believe there are grounds for sealing the documents and the application should be denied due to the strong presumption in favor of public disclosure.

Respectfully submitted,

DATED: December 23, 2025

THE LAW OFFICES OF DALE K. GALIPO

By: /s/ Eric Valenzuela

Eric Valenzuela

Attorneys for Plaintiffs